

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARY L. WHITE,	)	Civil Action No. 00-CV-2466
	)	
Plaintiff,	)	Magistrate Judge Amy R. Hay
	)	
v.	)	
	)	
SHAYEN A. GEORGE, M.A.	)	
	)	
Defendant.	)	

**ANSWER TO AMENDED COMPLAINT**

Defendant, Shayen A. George, by and through his undersigned counsel, incorporates his Answer to Complaint and Action for Declaratory Judgment Pursuant to 18 USC §2201, and all affirmative defenses set forth therein, and Second Amended Counterclaim, as if the same were more fully set forth herein at length, and further responds to the Amended Complaint of Plaintiff as follows:

91(A). Admitted in part and denied in part. It is admitted only that on or about April 16, 1999, Associates in Counseling and Child Guidance, Inc. (“ACCG”) opened an account at National City Bank. The remaining averments of Paragraph 91(A) are denied.

91(B). Denied. As Plaintiff is already aware, the account was not utilized by ACCG until December of 1999, when the Plaintiff was placed on administrative leave by ACCG.

91(C). The averments contained in Paragraph 91(C) constitute conclusions of law which require no response. To the extent a response is required, the averments are denied.

91(D). Denied. The account was not utilized by ACCG until the time when Mary White was placed on administrative leave by ACCG. The account was neither “secret” nor “fraudulent.”

92(D). The averments contained in Paragraph 92(D) constitute conclusions of law which require no response. To the extent any response is required, the averments are denied. See answer to Paragraph 91(D).

93(E). Denied. Information relating to the account has been provided in strict accordance with orders of the Court of Common Pleas of Mercer County, Pennsylvania.

Respectfully submitted,

METZ LEWIS LLC

SP3061/Steven Petrikis, Esq.

Pa. I.D. No.: 34426

Brian T. Must, Esq.

Pa. I.D. No.: 49657

Michael P. Robic II, Esq.

Pa. I.D. No.: 75578

11 Stanwix Street, 18<sup>th</sup> Floor  
Pittsburgh, PA 15222  
(412) 918-1100

John P. Corcoran, Jr., Esq.

Pa. I.D. No. 74906

411 Seventh Avenue, Suite 1200  
Pittsburgh, PA 15219-1905

(412) 261-6400

Attorneys for Defendant,  
Shayen George

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that a true and correct copy of the foregoing **ANSWER TO AMENDED COMPLAINT** has been served via first-class mail, postage pre-paid on this 4<sup>th</sup> day of October, 2005, upon the following counsel of record:

Stanley M. Stein, Esq.  
Beth S. Mills, Esq.  
Feldstein, Grinberg, Stein & McKee  
426 Boulevard of the Allies  
Pittsburgh, PA 15219

SP3061/Steven Petrikis, Esq.